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September 19, 2021

Hon. Kenneth M. Karas
United States District Court – SDNY
300 Quarropas Street
White Plains, Ny 10601

Re: *Lawrence v. Northwell Health, Inc.*, 19 cv 07448 (KMK)(JCM)

Dear Judge Karas,

I represent plaintiff in this employment discrimination case and write to request a one week extension of the due date for my papers in response to defendant's motion for summary judgment.

Defendant filed its motion for summary judgment on August 31, 2021 and my response is due tomorrow. I have conferred with counsel for defendant who has agreed to my request for a one week extension of my time to file opposition papers, that is until September 27, 2021. Counsel has requested until October 18, 2021 to file his reply papers and I have no objection.

I make this request because I have not yet completed my opposition papers due to my need to concentrate on other matters during the last three weeks as follows:

Draft response to summary judgment papers in *Coley v. Garland, et al.* [NDNY]
Draft Reply papers in *Myruski v. DeBlock* [Orange County Supreme Court]
Draft Petition and Brief in Support in Article 78 proceeding *Galazzo v. Mt. Vernon School Dist.* [Westchester County Supreme Court]
Draft Motion for TRO in *Baker v. Peters* [Sullivan County Supreme Court]
Draft Reply Brief in *M.A. v. County of Rockland* [2d Circuit]
Draft Reply Brief in *Santucci v. Town of Southeast* [2d Circuit]
Draft Opening Brief in *Sustainable Portchester v. Village of Portchester* [2d Dep't]
Draft Reply Brief in Chief in *Langton v. Sussman & Watkins* [2d Dep't]
Draft Final PTO in *Cocuzza and McNichols v. County of Rockland* [SDNY][VB]
Draft Final PTO in *Snowden v. Village of Monticello* [SDNY][VB]
Draft Motion in *People v. Meyer* [Town of Newburgh Justice Court]

I have also prosecuted a contempt proceeding in *Ehlermann v. Wodzinski* in Orange County Supreme Court, appeared in Yates County Court to resolve a 95 count felony indictment [*People v. Elizabeth Catlin*] and conducted seven depositions in the last three weeks in the

matters of *Bierce v. Town of Fishkill*, [S.D.N.Y.], *Streichert v. Town of Chester* [S.D.N.Y] and *Baker v. City of Aurora, Co.* [D.Ct Co].

Your consideration of my request for this brief extension is much appreciated.

Respectfully submitted,


Michael H. Sussman

cc: Jonathan Stoler, Esq.